

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIE DALESSIO, an individual,
Plaintiff,

V.

UNIVERSITY OF WASHINGTON, a Washington Public Corporation; ELIZA SAUNDERS, Director of the Office of Public Records, in her personal and official capacity; ALISON SWENSON, Compliance Analyst, in her personal capacity; PERRY TAPPER, Public Records Compliance Officer, in his personal capacity; ANDREW PALMER, Compliance Analyst, in his personal capacity; JOHN or JANES DOES 1-12, in his or her personal capacity,

Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF PERRY TAPPER
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT

I, Perry Tapper, declare as follows:

1. I am over the age of 18, and am otherwise competent to testify as to all matters herein, and make the following statements based on my own personal knowledge.
2. I am employed as a Compliance Officer in the Office of Public Records and Open Public Meetings (“OPR”). Eliza Saunders, Director of the Office, is my supervisor. At times, I provide input and discuss with Ms. Saunders how the processes developed for processing public records requests are working, and evaluate potential improvements in

**DECLARATION OF PERRY TAPPER IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT - 1**

JUDGMENT - I
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KEATING, BUCKLIN & MCCORMACK, INC., P.S.

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1 light of logistics, resources, and the records management systems and infrastructure of
2 the University of Washington organization as a whole.

3 3. In my role as Compliance Officer, I train and supervise OPR staff including Public
4 Records Analysts. I supervised Analysts Alison Swenson and Andrew Palmer during
5 the 2015-2017 timeframe.

6 4. In my role as a Compliance Officer, I am familiar with the processes used by the OPR
7 to process and track public records requests, request and locate responsive documents
8 throughout the University, evaluate documents for potential exemptions under the
9 Public Records Act (RCW Ch. 42.56), and prepare exemption logs and responses. I
10 participated in training Ms. Swenson and Mr. Palmer, which consisted primarily of “on
11 the job” training.

12 5. The Office keeps a “glossary” of exemptions listed in the PRA as a resource guide to
13 evaluating exemptions and determining whether records can be withheld or sufficiently
14 redacted pursuant to an applicable redaction. While some exemptions are specific, many
15 require individual assessment of the nature of information contained therein and
16 whether a specific exemption applies.

17 6. I did not personally prepare or process the PR-2015-570 public records request from
18 Mr. Betz in 2015. It is my understanding that Analyst Alison Swenson did in the course
19 of her job duties as an analyst. I did not know of either Mr. Betz or Ms. Dalessio prior
20 to this request.

21 7. I did not personally prepare or process the PR-2016-760 public records request from
22 Ms. Dalessio in 2016. It is my understanding that Analyst Andrew Palmer did in the
23 course of his job duties as an analyst.

24 8. Typically, each Analyst is responsible for processing and maintaining records related to
25 their own case files, including making redactions, exemption logs, and producing
26 records to requestors. I am available to answer questions and routinely speak with the

27 **DECLARATION OF PERRY TAPPER IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY**

JUDGMENT - 2

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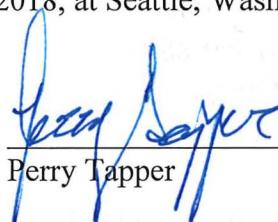
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1 Compliance Analysts regarding questions or issues that may come up. I believe I spoke
2 with Ms. Swenson regarding one of Ms. Dalessio's public records requests (she has
3 made several since 2016), but I do not recall specifically the subject matter or
4 discussion.

5 I declare under penalty of perjury under the laws of the State of Washington that the
6 foregoing is true and correct to the best of my knowledge.

7 DATED this 25th day of October, 2018, at Seattle, Washington.

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11 Perry Tapper

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27 **DECLARATION OF PERRY TAPPER IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY
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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

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DATED: October 25, 2018

/s/ Jayne L. Freeman

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**DECLARATION OF PERRY TAPPER IN SUPPORT
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